

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
MICHAEL J. JONES JR.,

Plaintiff,

v.

BETH ISRAEL HOSPITAL,
Defendant.

Case No. 17-cv-03445-GHW

**DECLARATION OF
ROBERT L. ISABELLA**

ROBERT L. ISABELLA, being first duly sworn, deposes and states as follows:

1. My name is ROBERT L. ISABELLA. I am over twenty-one (21) years of age, suffer from no legal disability, and am competent to make this declaration. I have personal knowledge of the facts set forth in this declaration and all of the facts recited herein are true and correct.

2. I am an associate attorney of the law firm of AARONSON RAPPAPORT FEINSTEIN & DEUTSCH, LLP, counsel to Defendant BETH ISRAEL MEDICAL CENTER s/h/a BETH ISRAEL HOSPITAL (hereinafter "Defendant") in the above-entitled action, and I am authorized to make this declaration on behalf of Defendant.

3. This declaration is submitted in support of the within motion pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure for an Order granting dismissal on behalf of Defendant on the grounds that Plaintiff has failed to state a claim upon which relief can be granted, as set forth in the accompanying memorandum of law.

4. Attached as **EXHIBIT "A,"** please find a copy of Plaintiff's Summons and Complaint dated May 2, 2017. See also ECF Doc. No. 1.

Dated: New York, New York
November 14, 2017

A handwritten signature in black ink, reading "Robert L. Isabella". The signature is fluid and cursive, with the first name "Robert" and last name "Isabella" clearly distinguishable.

BY: ROBERT L. ISABELLA (RI0512)
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DEUTSCH, LLP
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